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*Attorneys for Defendant Freedomsoft303, LLC*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,  
*as assignee of individuals who are Covered  
Persons*, SCOTT MALONEY, JUSTYNA  
MALONEY, and PETER ANDREYEV,

Plaintiffs,

v.

FREEDOMSOFT303, LLC, RICHARD ROES  
1-10, *fictitious names of unknown individuals*  
and ABC COMPANIES 1-10, *fictitious names  
of unknown entities*,

Defendants.

CIVIL ACTION

**LIMITED LIABILITY COMPANY  
OWNERSHIP DISCLOSURE**

Civil Action No. 2:25-cv-09224

Pursuant to Federal Rule of Civil Procedure 7.1 and this Court's Order dated June 11, 2025 [Dkt. 4], Defendant FreedomSoft303, LLC ("Defendant" or "FreedomSoft"), by and through its undersigned attorneys Constangy, Brooks, Smith & Prophete, LLP, hereby provides its Corporate Disclosure Statement as follows:

FreedomSoft is a non-governmental, limited liability company of the State of Colorado, with its principal place of business in Broomfield County, Colorado. Freedomsoft is 100% owned

by Home Solution, Inc., a Colorado Corporation. Home Solution, Inc. is owned by two individuals, both of whom are residents of the State of Colorado.

Pursuant to 28 U.S.C. § 1746 and Fed. R. Civ. P. 11, I certify that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 23, 2025

Respectfully submitted,

s/ John E. MacDonald

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2025, the foregoing was filed electronically. Notice of this filing will be sent to the below listed attorneys of record by operation of the Court's electronic filing system. The parties may access this filing through the Court's system.

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